

December 1, 2020

Via Electronic Filing

Honorable Debra C. Freeman
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St., Courtroom 17A
New York, NY 10007-1312
(212) 805-4650

Re: *In re Application of Pioneer Recovery Fund LLP, et al.*
Case No. 1:20-mc-00293-JGK-DCF

To the Honorable Debra C. Freeman:

This office is counsel to applicants Pioneer Recovery Fund LP and Champlain Investment Holdings Ltd. (together, “Applicants”) in the above-referenced action. I write pursuant to Rule 1(E) of Your Honor’s Individual Practices to respectfully inquire as to the status of the instant application pursuant to 28 U.S. Code § 1782. As set forth in the papers submitted in support of the application, Applicants are plaintiffs in a foreign proceeding that will shortly be initiated in the Commonwealth of the Bahamas, and, should this Court grant their application, would like to proceed with serving the proposed subpoenas and obtaining discovery for the foreign proceeding. If Your Honor would like counsel to appear for a remote hearing with regard to the pending application, we are available at Court’s earliest convenience.

Respectfully,



Matthew A. Beyer